

May & Johnson, P.C.

6805 S. Minnesota Avenue
P.O. Box 88738
Sioux Falls, SD 57109-8738
Phone (605) 336-2565 Fax (605) 336-2604
Tax ID 46-0339460

April 7, 2016

Billed through 03/31/16

INVOICE # 11925 - 00304 - 30972 MJA

Garrett Brandenburger
Claims Attorney III
United Financial Casualty Co.
10929 Disk Dr.
Rancho Cordova, CA 95670

Insured: Hofer Transport, LLC
DOL: 1/19/13
Claim No: 13-4802882
Policy No: 08473611-0
Insured: Driver/Plaintiff: Steven Hofer

FOR PROFESSIONAL SERVICES RENDERED

03/01/16	MJA	Additional research regarding plaintiff's request for additional information related to client's employees employment files and ability to protect client's employees employment files L310 A102	0.70 hrs
03/01/16	MJA	Draft letter to plaintiff's counsel responding to plaintiff's 2 separate letters identifying numerous items plaintiff is requesting that client supplement related to plaintiff's discovery requests and explain client's prior responses to plaintiff's counsel and client's position regarding claims of privilege for work product documents and attorney client privilege documents L310 A103	2.20 hrs
03/02/16	MJA	Revise client's privilege log providing more detail to client's claims of privileges for work product in anticipation of litigation and attorney client communications per request of plaintiff's counsel L310 A103	0.80 hrs

Blumberg No. 5192

EXHIBIT

A

03/02/16	MJA	Continue drafting letter to plaintiff's counsel responding to request from plaintiff's counsel to supplement prior discovery responses and clarify privilege objections L310 A103	0.80	hrs
03/03/16	MJA	Review 2011 IME report of Dr Segal as forwarded by Garrett Brandenburger of Progressive in anticipation of producing same per plaintiff's discovery request for prior work of Dr Segal for United L340 A104	0.30	hrs
03/03/16	MJA	Revise stipulation for protective order into joint motion for protective order as requested by plaintiff's counsel L320 A103	0.30	hrs
03/03/16	MJA	Phone conf with Garrett Brandenburger at United regarding proposed edits to draft of letter responding to plaintiff's request that client supplement prior discovery responses L310 A106	0.20	hrs
03/03/16	MJA	Make edits to response letter to plaintiff's counsel regarding supplements to client's prior discovery responses based upon phone conversation with Brandenburger L310 A103	0.50	hrs
03/04/16	MJA	Draft e-mail to plaintiff's counsel regarding client's responses to plaintiff's request that client supplement discovery L310 A107	0.20	hrs
03/11/16	MJA	Review plaintiff's 5 page letter and authority cited by plaintiff regarding request for client to supplement prior discovery responses L310 A104	0.40	hrs
03/14/16	MJA	Review e-mail from Garrett Brandenburger at Progressive responding to plaintiff's 3/11 letter in which plaintiff requested that client supplement written discovery L310 A104	0.30	hrs
03/15/16	MJA	Begin drafting lengthy letter to plaintiff's counsel responding to plaintiff counsel's 3/11 letter requesting that client supplement written discovery requests in an effort to avoid motion to compel by plaintiff L310 A103	1.80	hrs
03/16/16	MJA	Revise client's privilege log based upon supplements to written discovery being produced to plaintiff L320 A103	0.70	hrs
03/16/16	MJA	Phone conf with Garrett Brandenburger at Progressive regarding edits to proposed letter responding to plaintiff's request that client supplement discovery responses L310 A106	0.20	hrs
03/17/16	MJA	Make additional edits to letter to plaintiff's counsel responding to plaintiff's request that client supplement discovery responses in an effort to avoid motion to compel hearing based upon recent conversation with Garrett Brandenburger and make additional redactions to client's claim notes that are being produced as supplements to client's document production L310 A103	0.80	hrs

Total fees for this matter

BILLING SUMMARY

Arndt, Mark J.

TOTAL FEES

6% SALES TAX ON FEES

May & Johnson, P.C.

6805 S. Minnesota Avenue
P.O. Box 88738
Sioux Falls, SD 57109-8738
Phone (605) 336-2565 Fax (605) 336-2604
Tax ID 46-0339460

May 17, 2016

Billed through 04/30/16

INVOICE # 11925 - 00304 - 31126 MJA

Garrett Brandenburger
Claims Attorney III
United Financial Casualty Co.
10929 Disk Dr.
Rancho Cordova, CA 95670

Insured: Hofer Transport, LLC
DOL: 1/19/13
Claim No: 13-4802882
Policy No: 08473611-0
Insured: Driver/Plaintiff: Steven Hofer

FOR PROFESSIONAL SERVICES RENDERED

04/14/16	MJA	Review plaintiff's 4/13 letter requesting supplemental discovery responses and draft e-mail to Garrett Brandenburger at Progressive forwarding same and briefly discuss strategy to respond to plaintiff's additional discovery requests	0.40 hrs
		L310 A106	
04/20/16	MJA	Phone conf with plaintiff's counsel regarding plaintiff's request that client continue to supplement discovery responses	0.20 hrs
		L310 A107	

04/20/16	MJA	Phone conf with Garrett Brandenburger at Progressive regarding strategy to respond to plaintiff's request for additional supplements to client's written discovery and various privilege claims L310 A106	0.40 hrs
04/21/16	MJA	Begin drafting letter responding to plaintiff's counsel's request that client supplement additional discovery L310 A103	2.40 hrs
04/21/16	MJA	Conduct additional research regarding South Dakota Federal District Court rulings in discovery disputes to support drafting response letter to plaintiff's counsel requesting that client supplement discovery and withdraw privilege claims L310 A102	1.80 hrs
04/21/16	MJA	Begin revising client's privilege log to supplement client's prior discovery responses and clarify privilege claims L320 A103	0.70 hrs
04/22/16	MJA	Research information in claims notes regarding producing additional discovery information regarding client's reserves during period of time between contact with plaintiff's counsel until plaintiff's counsel began litigation and consider privilege claims based upon work product doctrine and exchange e-mails with Garrett Brandenburger regarding same L320 A104	0.70 hrs
04/22/16	MJA	Finalize letter to plaintiff's counsel responding to plaintiff's request that client supplement discovery responses and clarify privilege claims L310 A103	0.50 hrs
04/25/16	MJA	Extended phone conf with plaintiff's counsel regarding attempts to resolve ongoing discovery disputes regarding various documents plaintiff is requesting that client produce L320 A107	0.40 hrs

Total fees for this matter

BILLING SUMMARY

Arndt, Mark J.

TOTAL FEES

6% SALES TAX ON FEES

May & Johnson, P.C.

6805 S. Minnesota Avenue
P.O. Box 88738
Sioux Falls, SD 57109-8738
Phone (605) 336-2565 Fax (605) 336-2604
Tax ID 46-0339460

June 8, 2016

Billed through 05/31/16

INVOICE # 11925 - 00304 - 31304 MJA

Garrett Brandenburger
Claims Attorney III
United Financial Casualty Co.
10929 Disk Dr.
Rancho Cordova, CA 95670

Insured: Hofer Transport, LLC
DOL: 1/19/13
Claim No: 13-4802882
Policy No: 08473611-0
Insured: Driver/Plaintiff: Steven Hofer

FOR PROFESSIONAL SERVICES RENDERED

05/01/16	MJA	Review plaintiff's counsel's 4/29 letter regarding ongoing discovery production request by plaintiff's counsel	0.10 hrs
		L310 A104	
05/01/16	MJA	Draft letter to plaintiff's counsel responding to plaintiff's 4/29 letter regarding plaintiff's request that client supplement discovery responses	0.30 hrs
		L310 A103	
05/02/16	MJA	Exchange e-mails with Garrett Brandenburger regarding ongoing discovery dispute with plaintiff's counsel and strategy to resolve discovery dispute	0.20 hrs
		L310 A106	
05/02/16	MJA	Exchange e-mails with plaintiff's counsel regarding specifics of plaintiff's request that client continue to supplement discovery responses	0.20 hrs
		L310 A107	

05/02/16	MJA	Exchange e-mails with Garrett Brandenburger at Progressive regarding list of Progressive employees in which Progressive is willing to voluntarily disclose portions of employment files L320 A106	0.20 hrs
05/02/16	MJA	Exchange e-mails with plaintiff's counsel regarding list of United employees for which client is willing to voluntarily produce portions of employment file L320 A107	0.20 hrs
05/03/16	MJA	Exchange e-mails with plaintiff's counsel regarding additional attempts to resolve discovery dispute L310 A107	0.20 hrs
05/03/16	DAG	Research issues relating to plaintiff's bad faith discovery request; specifically, authority regarding discoverable information regarding client's employees' personnel files L310 A102	2.60 hrs
05/16/16	MJA	Review 21-page Brief from Plaintiff's counsel regarding Plaintiff's Motion to Compel L350 A104	0.60 hrs
05/16/16	MJA	Research authority cited by Plaintiff's counsel in Plaintiff's Brief regarding Plaintiff's Motion to Compel L350 A102	0.60 hrs
05/16/16	MJA	Review Plaintiff's counsel Affidavit and multiple attachments in support of Plaintiff's Motion to Compel L350 A104	1.40 hrs
05/16/16	MJA	Draft e-mail to Garrett Brandenburg at Progressive forwarding Anspach case with explanation regarding alternative method to satisfy Plaintiff's request for employee's personnel file L320 A106	0.30 hrs
05/18/16	MJA	Draft Facts section of client's Brief in Opposition to Plaintiff's Motion to Compel L350 A103	2.50 hrs
05/18/16	MJA	Participate in conference call with Garrett Brandenburg of Progressive regarding strategy to respond to Plaintiff's Motion to Compel L350 A106	0.60 hrs

05/20/16	DAG	Begin drafting argument section in brief in opposition to motion to compel L350 A103	2.40 hrs
05/23/16	DAG	Continue drafting arguments section in Brief in Opposition to Motion to Compel L350 A103	1.10 hrs
05/25/16	DAG	Research ND statutes regarding PIP benefits and rights of insurer obtaining medical exam relating thereto, in order to support Brief in Opposition to Motion to Compel L350 A102	0.90 hrs
05/25/16	DAG	Research case law to suggest that insurer has right to select doctor for IME to support Brief in Opposition to Motion to Compel L350 A102	0.90 hrs
05/25/16	DAG	Continue drafting Brief in Opposition to Plaintiff's Motion to Compel L350 A103	2.10 hrs
05/27/16	MJA	Continue revising DAG draft of client's brief in opposition to plaintiff's motion to compel L350 A103	3.20 hrs
05/31/16	MJA	Continue drafting client's brief in opposition to plaintiff's motion to compel L350 A103	1.90 hrs

Total fees for this matter

BILLING SUMMARY

Grennan, David A.
Arndt, Mark J.

TOTAL FEES

6.5% SALES TAX ON FEES

TOTAL CHARGES FOR THIS BILL

NET BALANCE FORWARD

TOTAL BALANCE NOW DUE

May & Johnson, P.C.

6805 S. Minnesota Avenue

P.O. Box 88738

Sioux Falls, SD 57109-8738

Phone (605) 336-2565 Fax (605) 336-2604

Tax ID 46-0339460

July 14, 2016

Billed through 06/30/16

INVOICE # 11925 - 00304 - 31462 MJA

Garrett Brandenburger

Claims Attorney III

United Financial Casualty Co.

10929 Disk Dr.

Rancho Cordova, CA 95670

Insured: Hofer Transport, LLC

DOL: 1/19/13

Claim No: 13-4802882

Policy No: 08473611-0

Insured: Driver/Plaintiff: Steven Hofer

FOR PROFESSIONAL SERVICES RENDERED

06/01/16	MJA	Conduct additional research regarding new Rule 26 proportionality standards for discovery to be included in client's brief in opposition to plaintiff's motion to compel	2.80 hrs
		L350 A102	
06/01/16	MJA	Continue drafting client's brief in opposition to plaintiff's motion to compel	2.40 hrs
		L350 A103	
06/02/16	MJA	Continue drafting client's brief in opposition to plaintiff's motion to compel including detailing facts section of brief with specific citations to claim notes regarding plaintiff's lack of apparent injury soon after motor vehicle accident and plaintiff's sporadic treatment for first few months following motor vehicle accident	2.80 hrs
		L350 A103	
06/02/16	MJA	Draft affidavit of defense counsel and organize exhibits in support of client's opposition to plaintiff's motion to compel	1.50 hrs
		L350 A103	
06/02/16	MJA	Continue drafting remainder of client's brief including arguments related to plaintiff's request for additional information from client's medical expert witness	0.80 hrs
		L350 A103	

06/03/16 MJA Finalize drafting client's brief in opposition to plaintiff's motion to compel and
organize exhibits to be attached to affidavit in support of opposition to motion to
compel and e-file brief and affidavit with exhibits 2.80 hrs
L350 A103

06/30/16 MJA Exchange e-mails with Judge Schreier and plaintiff's counsel regarding court's
request to schedule telephonic hearing regarding plaintiff's motion to compel on
7/21 0.10 hrs
L350 A108

Total fees for this matter

BILLING SUMMARY

Arndt, Mark J.

TOTAL FEES

6.5% SALES TAX ON FEES

TOTAL CHARGES FOR THIS BILL

NET BALANCE FORWARD

TOTAL BALANCE NOW DUE